

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
AT ABINGDON

STACEY LYNN REICHLER,

Plaintiff,

 \mathbf{V}_i

Case No. 1:21CV70637

THE TOWN OF ABINGDON,

Defendant.

MOTION TO AMEND RESPONSIVE PLEADINGS

This matter is before the Court upon the motion of defendant, The Town of Abingdon (“Abingdon”), for leave to amend its responsive pleadings. In discovery, the Town received information in response to subpoenas duces tecum that shows Ms. Reichler’s felony history that was not disclosed on her application for employment and was previously unknown to the Town. As a result, the Town moves to amend its answer in the Twelfth Defense. The plaintiff does not oppose this amendment. An agreed order is attached as Exhibit 1 to the motion and the proposed Amended Answer is attached as Exhibit 2.

TOWN OF ABINGDON
By Counsel

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

/s/ Cameron S. Bell
Cameron S. Bell